

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
Northern Division

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CR. NO. 2:10cr186-MHT
	)	
MILTON E. McGREGOR, et al.,	)	
	)	
Defendants.	)	

**MOTION FOR APPROPRIATE RELIEF**

COMES NOW the Defendant Milton E. McGregor and shows unto the Court as follows:

1. On December 17, 2010, Defendant McGregor filed a “Motion of Defendant Milton McGregor to Amend the Conditions of his Release under 18 U.S.C. § 3142” (Doc 291).
2. Defendant also filed on December 17, 2010, a “Motion for Leave to File Under Seal” (Doc 292) the medical documentation (Doc 293).
3. On December 17, 2010 (Doc 294), the Court entered an “Order on Motion and Protective Order”.
4. On January 14, 2011, the Government filed “Response in Opposition to Motion of Milton E. McGregor to Amend the Conditions of His Release under 18 U.S.C. § 3142” (Doc 349). The Response was **not** filed under seal. Portions of the Government’s response address the medical information of Defendant McGregor. Those portions of the Government’s response are in violation of the Court’s Protective Order.
5. The following is an example of a media report:

**Prosecutors, Milton McGregor trade jobs**

*Posted: Jan 18, 2011 2:51 PM EST Updated: Jan 18, 2011 2:51 PM EST*

By Alan Collins

BIRMINGHAM, AL (WBRC) - Federal prosecutors filed papers Tuesday explaining why they oppose easing the conditions of Milton McGregor's release.

McGregor has been accused of bribing lawmakers to pass a bill legalizing electronic bingo in Alabama. As a part of McGregor's release as he awaits trial, he is forced to wear an electronic monitoring device on his leg.

In legal papers revealed by prosecutors Tuesday to FOX6 News, McGregor claims the device interferes with his sleep and aggravates his hypertension. McGregor has asked to have the device removed and ease his curfew.

Prosecutors, though, oppose the request. Prosecutors say if the Victoryland owner wants the device removed he should surrender to authorities and remain in custody until his trial on April 4.

Prosecutors also oppose the motion contending McGregor threatened federal agents the day of his arrest. McGregor's attorney has filed affidavits from his wife, Pat, and the head of his security, Mike Johnson, denying there was any threat that day.

U.S. District Judge Myron Thompson has yet to rule on the motion.

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WHEREFORE, Defendant McGregor requests any and all relief and/or sanctions to which he may be entitled.

Respectfully submitted,

*s/ Joe Espy, III*  
Joe Espy, III (ASB-6591-S82J)  
One of the Attorneys for Milton E. McGregor

OF COUNSEL:

Benjamin J. Espy (ASB-0699-A64E)  
William M. Espy (ASB-0707-A41E)  
MELTON, ESPY & WILLIAMS, P.C.  
P.O. Drawer 5130  
Montgomery, AL 36103  
Telephone: 334-263-6621  
Facsimile: 334-263-7252  
[jespy@mewlegal.com](mailto:jespy@mewlegal.com)  
[bespy@mewlegal.com](mailto:bespy@mewlegal.com)  
[wespy@mewlegal.com](mailto:wespy@mewlegal.com)

Fred D. Gray (ASB-1727-R63F)  
Walter E. McGowan (ASB-8611-N27W)  
GRAY, LANGFORD, SAPP  
McGOWAN, GRAY, GRAY  
& NATHANSON, P.C.  
P.O. Box 830239  
Tuskegee, AL 36083-0239  
Telephone: 334-727-4830  
Fax: 334-727-5877  
[fgray@glsmgn.com](mailto:fgray@glsmgn.com)  
[wem@glsmgn.com](mailto:wem@glsmgn.com)

Robert D. Segall (ASB-7354-E68R)  
David Martin (ASB-7387-A54J)  
Shannon Holliday (ASB-5440-Y77S)  
COPELAND, FRANCO, SCREWS & GILL, P.A.  
P.O. Box 347  
Montgomery, Alabama 36101-0347  
Telephone: 334-834-1180  
Fax: 334-834-3172  
[segall@copelandfranco.com](mailto:segall@copelandfranco.com)  
[martin@copelandfranco.com](mailto:martin@copelandfranco.com)  
[holliday@copelandfranco.com](mailto:holliday@copelandfranco.com)

Sam Heldman (ASB 3794 N60S)  
THE GARDNER FIRM, P.C.  
2805 31st Street NW  
Washington, DC 20008  
Telephone: (202) 965-8884  
Fax: (202) 318-2445  
[sam@heldman.net](mailto:sam@heldman.net)

**CERTIFICATE OF SERVICE**

I hereby certify that on January 18, 2011, I filed the foregoing with the Clerk of the Court using the CM/ECF filing system, and that a copy of same will be served on the below listed counsel of record via such system:

Peter Ainsworth  
Brenda K. Morris  
Emily Rae Woods  
Lewis Franklin  
Steve Feaga  
Barak Cohen  
Federal Bureau of Investigation  
One Commerce Street, Suite 500  
Montgomery, AL 36101

G. Doug Jones  
Haskell Slaughter Young & Rediker  
2001 Park Place North  
Suite 1400  
Birmingham, AL 35203

David McKnight  
Baxley, Dillard, Dauphin, McKnight & Barclift  
2008 Third Avenue South  
Birmingham, AL 35233

Jack Sharman  
Lightfoot, Franklin & White  
400 20th Street North  
Birmingham, AL 35203

William N. Clark  
Redden Mills & Clark  
505 North 20<sup>th</sup> Street, Suite 940  
Birmingham, AL 35203

Ron W. Wise  
Attorney at Law  
200 Interstate Park Drive, Suite 105  
Montgomery, AL 36109

H. Lewis Gillis  
Thomas Means Gillis & Seay  
P.O. Drawer 5058  
Montgomery, AL 36103

J. W. Parkman, III  
Parkman, Adams & White  
505 20<sup>th</sup> Street North, Suite 825  
Birmingham, AL 35203

Susan G. James  
Attorney at Law  
600 South McDonough Street  
Montgomery, AL 36104

Thomas M. Goggans  
Attorney at Law  
2030 East Second Street  
Montgomery, AL 36106

*s/ Joe Espy, III*  
Of Counsel